



**EVALUATION OF  
PROGRAM IMPLEMENTATION  
ILAB'S CHILD LABOR PROJECTS  
FYs 1995-2000**

**BUREAU OF INTERNATIONAL LABOR AFFAIRS**

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## **ACRONYMS AND GLOSSARY**

### **ACRONYMS**

AAFLI	-	Asian-American Free Labor Institute
BGMEA	-	Bangladesh Garment Manufacturers and Exporters Association
ETA	-	Employment and Training Administration
ILAB	-	Bureau of International Labor Affairs
ICLP	-	International Child Labor Program
ILO	-	International Labor Organization
IPEC	-	International Program on the Elimination of Child Labor
MOU	-	Memorandum of Understanding
OASAM	-	Office of the Assistant Secretary for Administration and Management
USDOL	-	United States Department of Labor

### **GLOSSARY**

Child Labor - Any economic activity performed by a person under fifteen. The term “child labor” usually refers to children performing work which is exploitative or detrimental to their development and generally does not include certain types of light work performed by children part-time, or legitimate apprenticeship opportunities.

## **EXECUTIVE SUMMARY**

We conducted an evaluation of the Bureau of International Labor Affairs' (ILAB) implementation of its child labor projects. Our evaluation covered the period FYs 1995 through 2000. The evaluation was designed to provide information on lessons learned from the FYs 1995 through 2000 implementation of child labor projects, and recommendations for any necessary improvements in ILAB's current child labor activities.

ILAB's responsibilities include conducting research and reporting on international child labor, administering grants to organizations engaged in efforts to eliminate child labor, and working to raise public awareness and understanding of the child labor issue.

## **RESULTS OF EVALUATION**

Based on our evaluation, ILAB appears to be making significant progress toward effective implementation of its child labor projects. Although progress is being made, we identified several areas where implementation of our recommendations will further increase ILAB's effectiveness in carrying out its high-impact programs designed to eliminate child labor worldwide.

### **FINDING 1 - PROJECT PLANNING**

ILAB's International Child Labor Program (ICLP) can improve overall project effectiveness and results by adopting a two-stage funding process. ICLP should first fund and conduct a needs and requirements assessment of the target population. ICLP should then use the information from the needs and requirements assessment to determine appropriate funding for implementation of the child labor elimination project.

Based on our review of ICLP project files for the period FYs 1995 through 2000 and our discussions with ICLP officials, we determined that ICLP funds and implements child labor elimination projects without first identifying the specific needs and requirements of the target populations.

### **FINDING 2 - PROJECT GOALS, OBJECTIVES AND INDICATORS**

While the ICLP child labor projects we examined have shown some success, based on our review of the project files and discussions with ICLP officials, it is difficult to determine the impact or level of success of the projects.

Our review of a sample of ICLP's projects implemented during the period FYs 1995 through 1999 disclosed that, in many instances, the goals, objectives and indicators were not specific nor were they adequately defined. As a result, it is difficult to comprehensively assess the benefits or outcomes

attained from the results that were generated.

### **FINDING 3 - PROJECT INSPECTION ALLEGATIONS**

One of the cornerstones of several of ICLP's child labor elimination projects is that inspections are conducted to verify that children have been removed from and not returned to targeted industries. The inspections serve to validate many of ICLP's reported results.

Allegations were received by ICLP regarding its inspection and verification system. It is not our intent to assess the validity of the allegations. Instead, we focused on ICLP's response to the allegations. We believe that ICLP can improve on: (1) its response to allegations received, (2) its followup on allegations, and (3) documenting its response and followup. There is very little information in the project files documenting the steps taken by ICLP in response to the allegations.

### **FINDING 4 - PROJECT SUSTAINABILITY**

We found that, overall, ICLP does a good job in delineating the roles of its partners in attempting to achieve project sustainability. However, ICLP can go a step further by obtaining written agreements from its project partners, which we believe will only enhance the probability that the partners will uphold their responsibilities. Having a written agreement increases the likelihood that the partners will commit to continuing the goals of the project once ICLP funding expires. A project is sustainable when a country or community is able to continue the goals and objectives of the project on its own without outside support.

### **FINDING 5 - OTHER MATTERS**

ICLP officials provided us a copy of draft General Guidelines for Review of Project Documents, last revised July 25, 2000. (See Exhibit 2.) According to these officials, the purpose of the General Guidelines is to provide criteria for ICLP staff use in their review of project documents. Further, these officials told us that the Guidelines is a living document which is in the process of being revised and improved. While we commend ICLP for initiating the development of these draft guidelines, we believe that ICLP should expand and strengthen the guidelines into an operations manual for staff use. Following are a few suggestions.

1. Incorporate our recommendations in the guidelines.
2. State the overall purpose of the guidelines.
3. Specify the roles of ICLP and ILO (and any other partners) for using the guidelines. The guidelines are very vague and confusing regarding the respective roles. There is little information regarding ICLP's role in matters such as:
  - a. Project proposal review and approval.
  - b. Site visits and ICLP monitoring.
4. Be consistent and clear in the use of terminology. In many instances, language is used interchangeably with several different meanings. For example, project management and

management structure are used interchangeably. ICLP may need to expand on its definitions section to provide clarification to terms.

Considering the fact that ICLP is in the process of hiring additional staff, we believe that clear, comprehensive guidelines are needed to increase overall ICLP staff efficiency and effectiveness.

## RECOMMENDATIONS

1. We recommend that ICLP adopt a two-stage funding process. ICLP should:
  - a. Fund and conduct a needs and requirements assessment of the target population.
  - b. Use the information from the needs and requirements assessment to determine appropriate funding for implementation of the child labor elimination project.
2. We also recommend that ICLP ensure that specific, well-defined outcomes oriented goals, objectives and indicators are developed and included for each project proposal.
3. With respect to project inspection allegations, we recommend that ICLP:
  - a. Thoroughly investigate and follow-up on all serious allegations.
  - b. Implement appropriate corrective actions.
  - c. Adequately document steps taken.
4. In addition, we recommend that ICLP obtain written agreements from project partners which clearly delineate each partner's role in capacity building and project sustainability.
5. Finally, ICLP should expand and strengthen the draft General Guidelines into an operations manual for staff use.

## AGENCY COMMENTS

*As ILAB indicated in its earlier comments, the OIG report does not appear to make clear how ILAB funds its international child labor projects. ILAB does not, as the report appears to consistently state, implement child labor projects directly. Rather, ILAB currently provides funding to the International Labor Organization's (ILO) International Program on the Elimination of Child Labor (IPEC). IPEC assesses the extent and nature of child labor in specific countries and implements projects aimed at removing children from hazardous work and providing them and their families with viable alternatives to child labor. This essential context is missing from the Executive Summary and the body of the report. Consequently, the roles of ILAB and IPEC are misrepresented throughout the report.*

*In their previous comments, ILAB requested that the Executive Summary be revised to fully reflect the situation. As currently written, it does not make clear the relative roles of ILAB and IPEC, nor does it provide information regarding the steps taken by ILAB's International Child Labor Program (ICLP) to increase staffing to manage child labor projects and enhance management and organizational controls.*

*ILAB also requested that the OIG withdraw the recommendation and finding on project planning (Recommendation and Finding #1) and reconsider the finding and recommendation on project inspections (Finding #3), taking into consideration information provided to the OIG Evaluation Office on August 31, 2000.*

**OIG's RESPONSE**

We disagree with ILAB's contention that the roles of ILAB and IPEC are misrepresented throughout the report. The background section of the report clearly delineates the roles of both ILAB and IPEC. While we agree that IPEC assesses the extent and nature of child labor in specific countries and implements projects aimed at removing children from hazardous work, we believe that overall responsibility for the efficiency and effectiveness of DOL's international child labor programs rests with ILAB. It is for this reason that we refer to ILAB when we discuss the overall effectiveness of the international child labor projects and any suggested recommendations.

We are not withdrawing our finding and recommendation on project planning. Based on our review of ICLP project files, we determined that ILAB was continuing to fund and implement its child labor elimination projects without first identifying the specific needs and requirements of the target populations. When this issue was brought to ILAB's attention by the OIG, ILAB told us that discussions had been held to change this practice and that, for future projects, needs assessments would be conducted prior to funding and implementation of its projects. Despite several requests, ILAB did not provide any documentation which demonstrated that ILAB was aware of this issue prior to being notified by the OIG. ILAB subsequently held meetings with the ILO and reached agreement that, for future projects, needs and requirements would be identified prior to project funding and implementation. We commend ILAB for taking steps to implement new procedures for conducting baseline studies prior to project development and funding.

Our finding and recommendation on project inspections (Finding #3) remains unchanged. We have carefully considered the additional information provided by ILAB on August 31, 2000, and continue to believe that ICLP can improve on: (1) its response to allegations received, (2) its followup on allegations, and (3) documenting its response and followup.

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A summary of ILAB's response to each finding, as well as our comments, are included in the findings

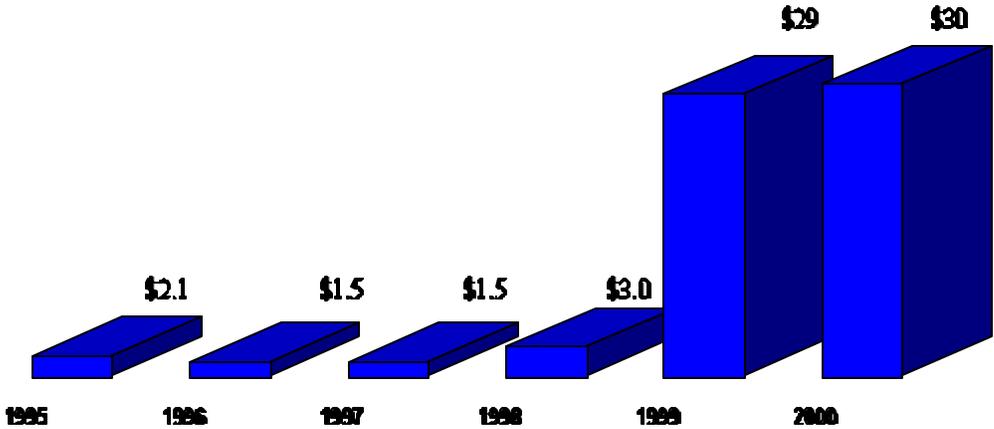
and recommendations section of this report. ILAB's complete written response is attached as Appendix A.

## BACKGROUND

The Bureau of International Labor Affairs (ILAB) carries out the Department of Labor's international responsibilities under the direction of the Deputy Under Secretary for International Affairs, and assists in formulating international, economic, trade and immigration policies affecting American workers.

ILAB's International Child Labor Program (ICLP) was created in response to a direct request from Congress to investigate and report on child labor around the world. Between fiscal years 1995 and 2000, Congress appropriated about \$68 million to ILAB for international child labor activities. As shown by the following chart, ICLP funding increased tenfold between FYs 1998 and 1999.

**ICLP Funding (\$Millions) - - FY95 through FY00**



As domestic and international concern about child labor has grown, ICLP's programs and activities have significantly expanded. Today, these activities include continued research and reporting on international child labor, administering grants to organizations engaged in efforts to eliminate child labor, and working to raise public awareness and understanding of the child labor issue. Since 1995, ICLP has contributed close to \$37 million to the International Labor Organization's International Program on the Elimination of Child Labor (IPEC). These funds support projects to remove tens of thousands of children in Africa, Asia, and Latin America from exploitative work, place them in schools, and provide their families with alternative income-generating opportunities. ICLP is also funding child labor surveys in various countries, enabling new countries to benefit from IPEC's technical assistance, and supporting IPEC efforts to raise awareness about child labor around the world.

DOL's Office of the Assistant Secretary for Administration and Management (OASAM) provides necessary procurement, financial, budget, contract/grant award and administrative support to ILAB to ensure the effective and efficient implementation of its child labor programs.

## **PURPOSE AND METHODOLOGY**

### **PURPOSE**

The purpose of this review was to evaluate the Bureau of International Labor Affairs' (ILAB) international child labor projects implemented by the International Labor Office (ILO) from FYs 1995 through 2000 and derive lessons learned from these projects. Specifically, we examined the following questions:

- (1) What results have the projects achieved?
- (2) How were those results achieved?
- (3) How has the ILO measured those results?
- (4) If project evaluations have been conducted, to what extent has ILAB incorporated recommendations from these evaluations in subsequent projects?

The evaluation will provide: (1) information on lessons learned from the FYs 1995 - 2000 implementation of child labor projects, and (2) recommendations for any necessary improvements of ILAB's current child labor activities.

### **METHODOLOGY**

Our methodology included an examination of ICLP project file documents for the period FYs 1995 through 2000 and information provided by ICLP officials. We selected a judgmental sample of 19 projects for review from a universe of 39 child labor projects. (Exhibit 1 is the list of the 39 child labor projects identified by ICLP as the universe.)

An entrance conference was held with ILAB and OASAM officials on June 1, 2000. Field work was conducted at ICLP's offices at the Frances Perkins Building in Washington, D.C. Several meetings were held with ICLP officials to discuss the results of our review.

We conducted our review in accordance with the *Quality Standards for Inspections* published by the President's Council on Integrity and Efficiency.

## **FINDINGS AND RECOMMENDATIONS**

### **FINDING 1 - PROJECT PLANNING**

ILAB's International Child Labor Program (ICLP) can improve overall project effectiveness and results by adopting a two-stage funding process. ICLP should first fund and conduct a needs and requirements assessment of the target population. ICLP should then use the information from the needs and requirements assessment to determine appropriate funding for implementation of the child labor elimination project.

Based on our review of ICLP project files for the period FYs 1995 through 2000 and our discussions with ICLP officials, we determined that ICLP funds and implements projects without first identifying the specific needs and requirements of the target populations.

An example is ICLP's Brazil Shoe Industry Project which, according to ICLP officials, was funded during FY 1995 in the amount of \$308,958. A project plan was developed which identified: (1) target groups, (2) objectives, (3) outputs, and (4) main activities, without first identifying the needs and requirements of the target population. According to the project plan, statistics on child labor in the Brazil Shoe Industry were not available. The project followed a two-phased strategy: during the first phase, surveys were conducted to increase general information on child labor in the shoe industry. Simultaneously, the situation of the children working in the shoe industry would be improved through negotiations with the owners of the work shops and an increase of their motivation to assume a moral commitment to protect the children working for them. During the second phase, selected groups of the children concerned were enrolled in or returned to regular schools through further conscientization of the families and providing the children with complementary educational services.

It is unclear how ICLP arrived at the stated goals of the project plan or the funding amount, absent specific, identifiable needs and requirements of the target population.

Another example is ICLP's Project on Combating Child Labor in the Coffee Industry of Central America and the Dominican Republic which was funded during FY 1999 in the amount of \$1,169,503. Similar to the Brazil project, a project plan was developed which identified (1) objectives, (2) outputs, and (3) activities without first identifying the needs and requirements of the target population. According to the project plan, a baseline survey would be conducted during the first 3-4 months of the project. The data from the baseline survey would be used to design the social protection programs (education, health and recreation, income-generation) in consultation with potential program partners and selected families.

Again, it is unclear how ICLP arrived at the stated goals of the project plan or the funding amount, absent specific, identifiable needs and requirements of the target population.

In the above described process, a project plan is developed prior to completing a needs and requirements assessment. The project plan includes stated goals and objectives which, according to ICLP, are sometimes modified upon the subsequent completion of a baseline study. We believe that conducting a needs and requirements, prior to the funding and implementation of the project, will not only assist ICLP in identifying the specific needs and requirements of the target population, but will also streamline the process by eliminating some of the subsequent modifications.

A good example where needs and requirements are identified prior to the award of a project is the Employment and Training Administration's (ETA) Welfare-to-Work program. The first criterion in ETA's review of grant applications is the identification of a relative need for assistance. This criterion requires that factual evidence related to the target population be provided and evaluated by ETA's Grant Officer prior to award of the grant.<sup>1</sup>

During meetings held on June 30 and July 20, 2000, ICLP officials agreed that needs and requirements assessments should be completed prior to funding and implementation of projects. ICLP officials told us that they have discussed, for those projects beginning in FY 2001, completing needs and requirements assessments prior to the funding and implementation.

We believe that identifying the needs and requirements of the target population prior to project funding and implementation can improve overall project effectiveness and results.

#### **AGENCY COMMENTS**

*The OIG Evaluation Office neither identified this issue nor contributed a solution and the recommendation was already being implemented. ILAB provided the OIG with information documenting the fact that ICLP had already started to implement this recommendation. During meetings with ILO on August 9-11, 2000, DOL and the ILO reached formal agreement that starting with fiscal year 2001, there would be a two-stage funding process for projects requiring baseline information. Under this agreement, IPEC will submit a separate proposal to DOL for project development, including baseline surveys. Accordingly, baseline data on target populations will first be collected and analyzed, then used as the basis for project development and budgeting.*

#### **OIG's RESPONSE**

As previously stated, based on our review of ICLP project files, we determined that ILAB was

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<sup>1</sup>Federal Register/Volume 63. No. 72/Wednesday, April 15, 1998/Notices/Page 18449

continuing to fund and implement its child labor elimination projects without first identifying the specific needs and requirements of the target populations. When this issue was brought to ILAB's attention by the OIG on June 29, 2000, ILAB told us that discussions had been held to change this practice and that, for future projects, needs assessments would be conducted prior to funding and implementation of its projects. Despite several requests, ILAB did not provide any documentation which demonstrated that ILAB was aware of this issue prior to being notified by the OIG.

On September 5, 2000, ILAB provided a two page excerpt from what ILAB stated was an agreement reached between ILO and ILAB during meetings held August 9-11, 2000. According to ILAB, under this agreement, IPEC will submit a separate proposal to DOL for project development, including baseline surveys. According to the two page excerpt, baseline data on target populations will first be collected and analyzed, then used as the basis for project development and budgeting.

We commend ILAB for taking steps to implement new procedures for conducting baseline studies prior to project development and funding.

We consider this recommendation to be resolved. The recommendation will be closed pending receipt of the entire official formal agreement reached between ILAB and ILO during the August 9-11 meeting. **Please provide the requested written documentation to this office by October 27, 2000.**

**Recommendation**

1. We recommend that ICLP adopt a two-stage funding process. ICLP should:
  - a. Fund and conduct a needs and requirements assessment of the target population.
  - b. Use the information from the needs and requirements assessment to determine appropriate funding for implementation of the child labor elimination project.

## **FINDING 2 - PROJECT GOALS, OBJECTIVES AND INDICATORS**

While the ICLP child labor projects we examined have shown some success, based on our review of the project files and discussions with ICLP officials, it is difficult to determine the impact or level of success of the projects.

### **Projects Need to Have Clearer Goals, Objectives, and Indicators**

Our review of a sample of ICLP's projects implemented during the period FY95 through FY99 disclosed that, in many instances, the goals, objectives and indicators were neither specific nor were they adequately defined. As a result, it is difficult to comprehensively assess the benefits or outcomes attained from the results that were generated. Following are a few illustrative examples.

**Example 1.** ICLP's Project on the Elimination and Prevention of Child Labor in Bangladesh Garment Manufacturers and Exporters Association (BGMEA) Factories. The stated objectives include items such as:

1. Withdrawal from work in the garment factories and enrollment in educational programs of around 10,000 children under 14 years.
2. Contribute to the elimination of child labor in Bangladesh's garment industry through the monitoring of employment in enterprises and by encouraging children to accept education as a substitute for employment.
3. Increased awareness within and outside Bangladesh on the purpose, progress and achievements of the monitoring and verification system.

Clearly, there were some significant results achieved -- a Memorandum of Understanding (MOU) was established with BGMEA to remove underage children from garment industry factories and 10,546 children were enrolled in educational programs. However, goals, objectives and indicators need to be specific, measurable and time bound. Simply stating that 10,546 children were enrolled in educational programs does not allow for a complete assessment of the benefits received by these children. How long were the children enrolled in educational programs? Were any of these children simultaneously employed in child labor? Why did many of these children drop out of the educational programs? What happened to these children in the short-term? What happened to these children in the long-term? Answering questions such as these would allow for a more comprehensive assessment of ultimate benefits or outcomes attained.

**Example 2.** ICLP's Project on the Elimination of Child Labor in Uganda. The indicators listed for this project include items such as:

1. A number of innovative strategies to combat or prevent the incidence of child labor developed

by social partners within their fields of expertise.

2. An effective national policy and plan of action against child labor operationalized.
3. Labor inspectors undertaking visits to monitor incidences of child labor.
4. National employers and workers organizations mainstreaming child labor into their regular work plans, activities and budgets.

As previously stated, goals, objectives and indicators need to be specific, measurable and time bound. In our view, the impact of the program could be better assessed if the above indicators were designed to measure impact and/or were better defined. For instance, ICLP needs to do a better job of explaining what does innovative strategies mean? How will they be accomplished? What will be accomplished? When will they be accomplished?

**Example 3.** ICLP's Project on Combating Child Prostitution in Costa Rica. The expected outputs for this project include such items as:

1. Approximately 200 children prevented from engaging in prostitution; 200 children withdrawn and rehabilitated from prostitution.
2. Families and community leaders sensitized to the dangers of child prostitution and capacitated to take action against the problem.
3. Experience and lessons learned from this project will be presented at the national level to devise further strategies for action at the national level.

These are just a few examples of ICLP projects where goals, objectives and indicators were neither specific nor adequately defined.

There are ICLP projects for which goals, objectives and indicators are more adequately defined. For example, ICLP's National Program on the Elimination of Child Labor in Nigeria includes goals, objectives and indicators such as a monitoring database established with all necessary information about the workplaces and child workers directly benefitting from the ICLP program in order to monitor their progress and ensure that the 3,000 (ex) child workers do not return to exploitative work situations.

We believe that ICLP needs to ensure that all of the child labor elimination projects include specific, well-defined goals, objectives and indicators in order to provide focus and direction to the projects, and to measure ultimate impact.

#### **AGENCY COMMENTS**

*ILAB agrees with OIG's recommendation that more specific, well-defined goals, objectives, and indicators should be included in ILAB-funded child labor projects, and ILAB is working closely with the ILO to continuously improve in this area. ILAB's ability to measure project impact will*

*be further improved with the inclusion of additional measurable indicators and tracking/monitoring mechanisms to determine the status of the target population at any given point of project implementation. ILAB has also been working, with OASAM, to apply GPRA principles at the project level by adopting more well-defined outcome goals linked to measurable project indicators of success. In addition, ILAB has added experienced staff from the OIG to strengthen its capacity to ensure that ILAB-funded child labor projects contain well-defined and outcome-oriented goals, objectives and indicators.*

#### **OIG's RESPONSE**

We consider this recommendation to be resolved. The recommendation will be closed pending the issuance of ILAB's General Guidelines/operations manual which includes a section on goals, objectives and indicators. **Please provide the requested written documentation to this office by December 22, 2000.**

#### **Recommendation**

2. We recommend that ICLP ensure that specific, well-defined outcomes oriented goals, objectives and indicators are developed and included for each project proposal.

### **FINDING 3 - PROJECT INSPECTION ALLEGATIONS**

One of the cornerstones of several of ICLP's child labor elimination projects is that inspections are conducted to verify that children have been removed from and not returned to targeted industries. The inspections serve to validate many of ICLP's claimed results.

We believe that ICLP can improve on: (1) its response to serious allegations regarding its inspection and verification system, (2) its followup on the allegations, and (3) documenting its response and followup. There is very little information in the project files documenting the steps taken by ICLP in response to the allegations.

#### **Serious Allegations Regarding the Credibility of ICLP's Inspection and Verification Systems were Received**

Allegations were made with regard to two ICLP projects--the project for the Elimination of Child Labor in the Soccer Ball Industry in Pakistan and the project for Mainstreaming the Verification and Monitoring System for the Elimination of Child Labor in Garment Factories in Bangladesh. The basic premise of the allegations was that children were removed from work sites to avoid detection by project monitors, and subsequently returned after the inspection and verification visits, casting doubt on the reported successes of these ICLP child labor projects.

It is not our intent to assess the validity of the allegations. Instead, we focused on ICLP's response to the allegations. There is very little information in the project files documenting the steps taken by ICLP in response to the allegations and any followup steps taken.

With regard to the Pakistan Project, there is documentation in the files indicating that ICLP did not respond to the specific allegations point by point. Instead, ICLP chose to issue a mid-term report which looked at the project in its entirety, including laying out where they started from, what their expectations were, whether or not they had met these expectations so far, where they had found problems and what they were doing to correct them, as well as an assessment of what else needed to be done. We believe that ICLP should have specifically addressed and documented its response to the issues contained in the allegations instead of simply stating how the system is designed to operate.

With regard to the Bangladesh project, there is evidence that steps were taken to address some of the allegations received. However, for other allegations, there is no documentation that any steps were taken. For example, there was an allegation from the AAFLI and the Bangladesh Independent Garment Workers Union that there were additional violations of the MOU than those uncovered by the inspectors. ICLP should have followed up to determine what the nature of the alleged violations were and documented what was done to address the allegations.

In our view, the inspection and verification systems provide the cornerstone for the credibility of reported project achievements and results. It is vital that serious allegations be thoroughly investigated and followed-up on, and any appropriate corrective actions be implemented. Further, any steps taken should be adequately documented.

#### **AGENCY COMMENTS**

*ILAB considers the credibility of the ILO's monitoring system to be essential to the success of the projects that are funded. ILAB agrees that each serious allegation requires follow up, and ILAB has consistently made it a priority to treat all allegations seriously through appropriate forms of follow up and documentation. Since some of the communication regarding the subject allegations was by telephone, each and every step taken by ICLP staff to follow up on the subject allegations may not have been documented.*

*However, it should not be assumed or implied that there was no follow up on the subject allegations. For example, as ICLP explained to the OIG Evaluation Office, there was follow up on the allegations regarding incidence of child labor in garment factories in Bangladesh and the stitching of soccer balls in Pakistan through ongoing discussions with ILO staff in Geneva, Dhaka, and Sialkot, review of project monitoring reports, as well as through project site visits. These site visits include meetings with local NGOs (including those who made the subject allegations), ILO monitors and project staff, and manufacturers. In addition, an ICLP staff member traveled to Bangladesh to participate in a final evaluation meeting for the garment project in June 2000. ICLP staff continues to thoroughly follow up on any new developments relating to ILAB funded child labor projects, including any child labor violations, as well as steps taken by the ILO to improve its monitoring system.*

*The OIG draft report initially focused on documentation of ICLP's response to allegations made regarding the monitoring systems of two IPEC projects—the soccer ball industry in Pakistan and the garment industry project in Bangladesh. On August 31, ILAB provided the OIG Evaluation Office with additional information from project files documenting follow up to allegations relating to the soccer ball project in Pakistan. This information shows that ICLP staff requested that the ILO seriously consider each of the allegations and prepare an appropriate response addressing the concerns raised.*

*The ILO subsequently conducted a mid-term review of the project, addressing the allegations and prepared a follow up letter with detailed comments responding to the specific allegations—this information is available in the project files. ILO staff from Geneva traveled to Pakistan to conduct the review along with project staff in Pakistan. In addition, ICLP staff conducted two site visits to Pakistan since the publication of the subject allegations. These visits*

*included meetings with local NGOs, soccer ball manufacturers, and ILO and government officials to review the status of the project, including the credibility of the monitoring system. ICLP staff also participated in monitoring visits with ILO monitors. In ILAB's opinion, this section of the report should have been substantially revised to reflect this new information.*

*In the OIG official draft report, however, the new information provided by ICLP is presented out of context and inaccurate conclusions are drawn. The OIG report alleges that ICLP did not provide a point by point response to the allegations made regarding the ILAB funded child labor project in the soccer ball industry in Pakistan and instead issued a mid-term report simply stating how the monitoring system is designed to operate. This is inaccurate for several reasons. First, ICLP requested that the ILO look into these allegations and treat each and every point with the utmost degree of seriousness. Second, concerns raised by the allegations were addressed in the ILO mid-term project review and in a follow up letter that provided detailed responses to the specific allegations.*

### **OIG's RESPONSE**

We are not assuming or implying that there was no follow-up on the subject allegations. ILAB acknowledges in its response that "each and every step taken by ICLP staff to follow up on the subject allegations may not have been documented." Our conclusions are based on:

(1) inadequate documentation to determine whether follow up occurred, and (2) documentation which demonstrates that the allegations were not specifically addressed; instead, the mid-term review and the responses to the allegations described how the system was designed to operate. For example, the follow up letter referenced above identifies one allegation as "Employers are often tipped off when monitors are en route to the stitching centers." The response to this allegation included in the referenced follow up letter is as follows: "All monitor visits are conducted by surprise. The choice of which stitching centers are visited on a particular day is done randomly, by computer. The monitors are given the names and locations of the centers to be visited every morning without prior knowledge. Moreover, most of the stitching centers do not have telephones, which would allow them to receive an early warning and hide their child laborers."

In our view, the response to this allegation describes how the system is designed to operate without investigating/addressing the specific allegation. Important questions which ICLP should have addressed include: (1) What is the basis for the allegations? (2) Are the employers being tipped off? (3) If so, how are the employers being tipped off? (4) Who is tipping off the employers? (5) How can this be prevented in the future? There is inadequate documentation to support that ICLP addressed questions such as these.

Again, we believe the inspection and verification systems provide the cornerstone for the credibility of reported project achievements and results. It is vital that serious allegations be thoroughly investigated

and followed-up on, and any appropriate corrective actions be implemented. Further, any steps taken should be adequately documented.

We consider this recommendation to be unresolved. The recommendation will be resolved and closed pending the issuance of ILAB's General Guidelines/operations manual which includes a section on responding to allegations. **Please provide the requested written documentation to this office by December 22, 2000.**

**Recommendation**

3. We recommend that ICLP:

- (a) Thoroughly investigate and follow-up on all serious allegations.
- (b) Implement any appropriate corrective actions.
- (c) Adequately document steps taken.

#### **FINDING 4 - PROJECT SUSTAINABILITY**

We found that, overall, ICLP does a good job in delineating the roles of its partners in attempting to achieve project sustainability. However, ICLP can go a step further by obtaining written agreements from its project partners, which we believe will only enhance the probability that the partners will uphold their responsibilities. Having a written agreement increases the likelihood that the partners will commit to continuing the goals of the project once ICLP funding expires. A project is sustainable when a country or community is able to continue the goals and objectives of the project on its own without outside support.

We believe that ICLP can use lessons learned from previous projects to identify the specific contributions to be made by each of the partners and include them in the written agreements. In many of its projects, ICLP delineates what the partners are expected to do. ICLP needs to obtain written agreements which commit the partners to carrying out their responsibilities. We recognize there may be special circumstances which preclude ICLP from obtaining written agreements. In those special circumstances, ICLP should fully document the reasons why written agreements could not be obtained.

#### **AGENCY COMMENTS**

*ILAB agrees with the importance of obtaining commitments by project partners to build capacity and project sustainability. This recommendation is based on two ground-breaking agreements that ILAB helped negotiate in Bangladesh and Pakistan. While these agreements worked well within the context of those projects to reiterate the commitments of the respective partners, this type of agreement may not be the appropriate mechanism to ensure sustainability of all project results in all cases. This is why in ILAB's September 1, 2000 memorandum, ILAB suggested modifying the phrasing of the recommendation to include obtaining written agreements "as appropriate." It is important to maintain at least a minimum level of flexibility in order to apply the most appropriate sustainability strategy on a case by case basis.*

#### **OIG RESPONSE**

We agree that it is important to maintain at least a minimum level of flexibility in order to apply the most appropriate sustainability strategy on a case by case basis. That is why we previously incorporated ILAB's suggestion into the body of our finding by stating that "we recognize there may be special circumstances which preclude ICLP from obtaining written agreements. In those special circumstances, ICLP should fully document the reasons why written agreements could not be obtained."

We consider this recommendation to be unresolved. The recommendation will be resolved and closed pending the issuance of ILAB's General Guidelines/operations manual which includes a section on

obtaining written agreements as one tool to increase the likelihood of project sustainability. **Please provide the requested written documentation to this office by December 22, 2000.**

**Recommendation**

4. We recommend that ICLP obtain written agreements from project partners which clearly delineate each partner's role in capacity building and project sustainability.

## **FINDING 5 - OTHER MATTERS**

ICLP officials provided us a copy of draft General Guidelines for Review of Project Documents, last revised July 25, 2000. (See Exhibit 2.) According to these officials, the purpose of the General Guidelines is to provide criteria for ICLP staff use in their review of project documents. Further, these officials told us that the Guidelines is a living document which is in the process of being revised and improved. While we commend ICLP for initiating the development of these draft guidelines, we believe that ICLP should expand and strengthen the guidelines into an operations manual for staff use. Following are a few suggestions.

1. Incorporate our recommendations in the guidelines.
2. State the overall purpose of the guidelines.
3. Specify the roles of ICLP and ILO (and any other partners) for using the guidelines. The guidelines are very vague and confusing regarding the respective roles. There is little information regarding ICLP's role in matters such as:
  - a. Project proposal review and approval.
  - b. Site visits and ICLP monitoring.
4. Be consistent and clear in the use of terminology. In many instances, language is used interchangeably with several different meanings. For example, project management and management structure are used interchangeably. ICLP may need to expand on its definitions section to provide clarification to terms.

Considering the fact that ICLP is in the process of hiring additional staff, we believe that clear, comprehensive guidelines are needed to increase overall ICLP staff efficiency and effectiveness.

## **AGENCY COMMENTS**

*ICLP is in the process of finalizing the General Guidelines for Review of IPEC Project Documents which will be incorporated into an operations manual for ICLP staff. ICLP has already reached agreement with the ILO on a number of matters, including project funding, oversight, monitoring, reporting, evaluation, and communications procedures, which will also be incorporated in the ICLP operations manual. ICLP has requested but not received a copy of the OIG's Office of Analysis, Complaints, and Evaluations operations manual, or other appropriate manuals, to be used as a model.*

## **OIG RESPONSE**

We commend ILAB for taking steps to finalize the General Guidelines and incorporating the document into an operations manual. As far as providing ILAB with a copy of the OIG's Office of Analysis,

Complaints, and Evaluations operations manual, we suggest that ILAB work closely with OASAM to identify and develop the necessary policies and procedures to be included in its operations manual. As part of the MOU between OASAM and ILAB signed April 25, 2000, OASAM agreed to provide advice and technical assistance during the pre-award and administration of all contracts and grants. We believe it is more appropriate for OASAM to assist ILAB by providing this technical assistance.

We consider this recommendation to be unresolved. The recommendation will be resolved and closed pending the issuance of ILAB's General Guidelines/operations manual. **Please provide the requested written documentation to this office by December 22, 2000.**

**Recommendation**

5. We recommend that ICLP expand and strengthen the draft General Guidelines into an operations manual for staff use.

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**Contributors to this report:**

Joan G. Wright  
Amy C. Friedlander

Gregory D. Simmons, Director, Division of Evaluations and Inspections

**EXHIBIT 1 - UNIVERSE OF ICLP PROJECTS  
FYs 1995 THROUGH 2000**

**USDOL-Funded IPEC Projects**  
**FY 1995- 2000**  
 (Updated: June 2, 2000)

COUNTRY	PROJECT	AMOUNT	DATE FUNDED	NUMBER OF CHILDREN & FAMILIES TARGETED
<b>Africa</b>				
<ul style="list-style-type: none"> <li>• Africa:</li> <li>• Ethiopia</li> <li>• Ghana</li> <li>• Kenya</li> <li>• Malawi</li> <li>• South Africa</li> <li>• Tanzania</li> <li>• Uganda</li> <li>• Zimbabwe</li> </ul>	<p><i>Technical workshop on Child Labor in Commercial Agriculture in Africa</i></p>	\$170,381	1996	• N/A
<ul style="list-style-type: none"> <li>• West &amp; Central Africa:</li> <li>• Benin</li> <li>• Burkina Faso</li> <li>• Ghana</li> <li>• Mali</li> <li>• Togo</li> <li>• Cameroon</li> <li>• Gabon</li> <li>• Ivory Coast</li> <li>• Nigeria</li> </ul>	<p>A systemic and comprehensive program to implement concrete measure against the practice of <i>trafficking</i> at a variety of levels.</p>	\$225,525	August 1999	• No children are targeted because this is a preliminary research phase; next phase will target children
Ghana	<p><i>National Program to eliminate Child Labor in Ghana</i></p>	\$650,703	October 1999	• 2,000 working children
	<p><i>Statistical Program for Advocacy on the Elimination of Child Labor and the Protection of Working Children in Ghana.</i></p>	\$397,617	September 1999	• N/A

COUNTRY	PROJECT	AMOUNT	DATE FUNDED	NUMBER OF CHILDREN & FAMILIES TARGETED
Nigeria	National Program to eliminate Child Labor in Nigeria	\$718,926	December 1999	• 3,000 children targeted for removal
	Statistical Program for Advocacy on the Elimination of Child Labor and the Protection of Working Children in Nigeria.	\$282,613	August 1999	• N/A
South Africa	Statistical Program for Advocacy on the Elimination of Child Labor and the Protection of Working Children in South Africa	\$687,697	July 1998 & August 1999	• N/A
Uganda	National Program to eliminate Child Labor in Uganda	\$1,196,262	May 1999	• 3,000 working children
	Statistical Program for Advocacy on the Elimination of Child Labor and the Protection of Working Children in Uganda.	\$295,608	September 1999	• N/A
Zambia	National Program to eliminate Child Labor in Zambia	\$630,512	September 1999	• 1,400 working children
	Statistical Program for Advocacy on the Elimination of Child Labor and the Protection of Working Children in Zambia.	\$289,775	September 1999	• N/A
<b>Asia</b>				
East and South East Asia	Conference on Core Labor Standards, including child labor.	\$111,870	December 1999	• N/A
South Asia: • Bangladesh • Nepal • Sri Lanka	Elimination of Trafficking of children in South Asia.	\$1,789,426	February 2000	• 1,700 children for removal and rehabilitation • 6,000 children prevented

COUNTRY	PROJECT	AMOUNT	DATE FUNDED	NUMBER OF CHILDREN & FAMILIES TARGETED
South East Asia: • Indonesia • Philippines • Thailand	Elimination of child labor in the <i>footwear industry</i> .	\$1,961,657	September 1999	<ul style="list-style-type: none"> <li>• 4,500 children for removal</li> <li>• 1,300 younger siblings</li> <li>• 1,500 adult family member for income generation</li> </ul>
South East Asia: • Indonesia • Philippines	Elimination of child labor in the <i>fishing industry</i> .	\$934,747	September 1999	<ul style="list-style-type: none"> <li>• 3,200 working or at-risk children</li> <li>• 400 younger siblings</li> <li>• 700 adult family members for income generation</li> <li>• 2,000 families plus 100 villages for awareness-raising</li> </ul>
Bangladesh	Elimination of child labor in <i>BGMEA garment factories</i>	\$867,273	February 1996	<ul style="list-style-type: none"> <li>• 10,000 children for removal</li> </ul>
	Phase II - Continuation of Monitoring and Verification Project	\$840,779	April 1998	<ul style="list-style-type: none"> <li>• working with the children targeted in Phase I</li> </ul>
Mongolia	<i>National Program</i> to eliminate Child Labor in Mongolia.	\$569,633	September 1999	<ul style="list-style-type: none"> <li>• 1,500 working children</li> <li>• 20,000 families targeted for awareness-raising</li> </ul>
Nepal	Elimination of <i>Trafficking and Commercial Sexual Exploitation</i> of girls. This includes Children Being Trafficked Into India	\$190,323	Fiscal Year 1997	<ul style="list-style-type: none"> <li>• 120-150 girls placed in prevention camps</li> <li>• 71 carpet factories which employ girls targeted for awareness raising activities</li> </ul>
Pakistan	Project to Phase Children Out of the <i>soccer ball industry</i> , Provide Educational Opportunities, and Conduct Internal and External Monitoring	\$755,744	September 1997	<ul style="list-style-type: none"> <li>• child laborers under 14 and their younger siblings; as of November 1998, 5,400 children were attending classes</li> </ul>
	Phase II	\$970,196	to be funded soon	

COUNTRY	PROJECT	AMOUNT	DATE FUNDED	NUMBER OF CHILDREN & FAMILIES TARGETED
Pakistan	Project to Phase Children Out of the Carpet Sector, Place Them in Schools, and Establish Compliance Monitoring System. (Phase I)	\$2,055,146	April 1999	<ul style="list-style-type: none"> <li>8,000 working children</li> <li>2,000 younger siblings</li> <li>2,000- 3,000 adult family members</li> </ul>
Philippines	A Statistical Program for Advocacy on the Elimination of Child Labor and the Protection of Children in the Philippines	\$268,465	October 1995	<ul style="list-style-type: none"> <li>N/A</li> </ul>
Thailand	Phase I - Program to Prevent Child Labor and <i>Forced Child Prostitution</i>	\$484,923	October 1995	<ul style="list-style-type: none"> <li>Girls living in three high risk provinces will benefit from reformed curriculum</li> <li>12,000-15,000 students targeted for awareness-raising</li> </ul>
	Phase II - Continuation of the Program to Prevent Child Labor and <i>Forced Child Prostitution</i>	\$261,070	1997	<ul style="list-style-type: none"> <li>same as above</li> </ul>
<b>Latin America and the Caribbean</b>				
Central America	Statistical Program for Advocacy on the Elimination of Child Labor and the Protection of Working Children in Central America.	\$2,210,173	October 1999	<ul style="list-style-type: none"> <li>N/A</li> </ul>
<ul style="list-style-type: none"> <li>Belize</li> <li>Costa Rica</li> <li>Dominican Republic</li> <li>El Salvador</li> <li>Guatemala</li> <li>Honduras</li> <li>Nicaragua</li> <li>Panama</li> </ul>				

COUNTRY	PROJECT	AMOUNT	DATE FUNDED	NUMBER OF CHILDREN & FAMILIES TARGETED
Central America: <ul style="list-style-type: none"> <li>• Costa Rica</li> <li>• Dominican Republic</li> <li>• El Salvador</li> <li>• Guatemala</li> <li>• Honduras</li> <li>• Nicaragua</li> </ul>	Combating Child Labor in the <i>coffee</i> industry of Central America.	Total: \$6,112,187 Reg.: \$1,169,503 C.R.: \$880,468 D.R.: \$636,586 E.S.: \$688,449 Guat.: \$1,193,848 Hond.: \$441,769 Nic.: \$1,101,564	November 1999	<ul style="list-style-type: none"> <li>• 21,300 children</li> <li>• 6,500 families</li> </ul> Breakdown: Costa Rica- 2,700 children/ 800 families; D.R.- 4,000 prevented/2,000 withdrawn/ 600 families; E.S.- 1,800 children/ 300 families; Guat.- 4,600 children/ 1,500 families; Hond- 1,200 children/ 400 families; Nic.- 4,000 children/ 500 families

COUNTRY	PROJECT	AMOUNT	DATE FUNDED	NUMBER OF CHILDREN & FAMILIES TARGETED
Central America:	Combating child labor in Central America and the Caribbean	\$1,000,000 total	1998	
• Regional	Creating a <i>database</i> on child labor information	\$50,000		• N/A
• Costa Rica	Combating <i>Child Prostitution</i>	\$160,700		• 200 children working as prostitutes targeted; • Additional at-risk children targeted for prevention workshops
• Dominican Republic	Combating Child Labor in <i>Agriculture</i>	\$160,000	August 1998	• 250 children for removal the families of targeted children trained in income generation
• El Salvador	Combating child labor in <i>shellfish harvesting</i>	\$100,000	April 1999	• 175 children families of the 175 children (72 families)

COUNTRY	PROJECT	AMOUNT	DATE FUNDED	NUMBER OF CHILDREN & FAMILIES TARGETED
• Guatemala	Combating child labor in <i>stone quarries</i>	\$100,000	1998	• 180 working children
• Nicaragua	Combating Child Labor and <i>Sexual Exploitation</i>	\$148,940	October 1998	• 100 girls working in the bus station • 90 families of those girls trained in income generation • 75 of the families will have access to revolving fund
South America: • Bolivia • Ecuador • Peru	Combating Child Labor in the <i>small gold mines</i> in South America.	\$2,859,123	March 2000	• 5,000 children removed (2,000 Bolivia; 1,000 Ecuador; 2,000 Peru) • 500 families trained in income generation
Brazil	Combating Child Labor in the <i>shoe industry</i> of Vale dos Sinos	\$308,958	October 1995	• Although 120 children, either working or formerly working in the footwear industry were targeted, <u>149</u> children were actually provided with education.
Brazil	<i>Statistical Program for the Advocacy of the Elimination of Child Labor</i> in Brazil	\$1,633,599	September 1999	• N/A
El Salvador	Combating child labor in the <i>fireworks industry</i>	\$1,008,327	March 2000	• 1,000 children for removal • 1,000 children for prevention • 500 working children over 15 for vocational training • 500 families trained in income generation • 300 families given access to credit

COUNTRY	PROJECT	AMOUNT	DATE FUNDED	NUMBER OF CHILDREN & FAMILIES TARGETED
Guatemala	Combating child labor in the <i>fireworks industry</i>	\$1,235,853	May 1999	<ul style="list-style-type: none"> <li>4,700 children (2,200 withdrawn; 2,500 prevented)</li> </ul>
Haiti	<i>National Program</i> to eliminate child labor in Haiti and an action program to combat <i>child domestics</i> .	\$1,223,535	February 1999	<ul style="list-style-type: none"> <li>1,000 children for removal</li> <li>10,000 working children provided with non-formal education</li> </ul>
Nicaragua	Combating Child Labor in the production of <i>basic grains</i> .	\$681,021	March 2000	<ul style="list-style-type: none"> <li>1,000 children removed</li> <li>4,000 working children prevented from leaving school</li> <li>360 siblings enrolled in pre-school</li> <li>360 more pre-schoolers receive social protection services</li> <li>300 families trained in income generation and given access to credit</li> </ul>
<u>Europe</u>				
Romania	<i>National Program</i> to eliminate child labor in Romania  <i>A Statistical Program</i> for Advocacy on the Elimination of Child Labor and the Protection of Children in Romania.	\$586,168	September 1999	<ul style="list-style-type: none"> <li>1,500 working children will benefit</li> </ul>
		\$288,647	September 1999	<ul style="list-style-type: none"> <li>N/A</li> </ul>
<u>Global</u>				
Worldwide Awareness against child labor	Support Efforts of the <i>Global March</i> Against Child Labor at the Country Level and at its Culmination in Geneva.  <i>IPEC Global Campaign</i> to Raise Awareness and Understanding about the Worst Forms of Child Labor	\$174,178	February 1998	<ul style="list-style-type: none"> <li>N/A</li> </ul>
		\$1,243,000	March 2000	

COUNTRY	PROJECT	AMOUNT	DATE FUNDED	NUMBER OF CHILDREN & FAMILIES TARGETED
	Publication and Presentation Materials for National Conference on Best Practices for the Elimination of Child Labor: Washington, D.C.	\$236,825	May 2000	• N/A
TOTAL		\$38,408,467		Education & Prevention/Removal 321,000 children Income and Employment Generation 13,900 families

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**EXHIBIT 2 - ICLP'S GENERAL GUIDELINES  
FOR REVIEW OF PROJECT  
DOCUMENTS IN FY 2000**

**USDOL-Funded IPEC Projects**  
**General Guidelines for Review of Project Documents**  
**in Fiscal Year 2000**  
(Draft: July 25, 2000)

**Background and Justification:**

This section should provide general information about the child labor situation in the country and the specific sector being targeted. The information provided should be compelling enough to justify the financial investment (USDOL funding) being made for the project. For example:

- What is the estimated number of children working in the country/sector?
- Under what conditions do children work?
- What are the labor laws/regulations concerning child labor?
- What is the primary/basic education law? Is basic education compulsory? Is it free?
- Available information on enrollment, attendance, drop-out, and completion rates for primary education.
- What efforts are being undertaken by government, industry, labor unions, NGOs, and international organizations to address the child labor problem?
- What relevant ILO's Conventions have been ratified?

[Please note that the availability of the information for this section depends on whether research, studies, surveys, and other assessments have already been conducted in the country/sector. Sources of information should be included where possible.]

**Program Approach and Strategy:**

This section should describe the approach and strategy that IPEC will use to deal with the child labor problem. For direct action projects, it should provide the following information:

- What strategy will be used to remove and/or prevent children from engaging in hazardous work? For example:
  - *awareness raising* (public education campaigns, videos, posters, radio/TV ads, meetings, conferences, etc.),
  - *education and vocational programs* (formal, non-formal, and technical skill training programs, learn and earn, etc.),
  - *income generating activities for parents* (such as revolving funds, micro-credits, etc.),
  - *other social protection services* (such as health care services, nutrition services, etc.)
  - *monitoring and tracking* (community-based or independent monitoring; strategy for tracking children during the life of the project as well as measuring the long-term impact of project),

- *industry/sector-specific agreements* (such as codes of conduct; bargaining agreements, MOUs, etc).
- How will the target population/beneficiaries be identified or selected? Baseline survey? Education infrastructure assessment? Economic assessment of families participating in income generating activities? What is the criteria for selecting beneficiaries?
- What type of management structure will be established to ensure that the project's objectives and goals are achieved? Are the responsibilities of project managers and implementing agencies clearly defined?
- Who are the relevant partners (government ministries, NGOs, employers groups/associations, labor unions, other international organizations)? What is their level of political and financial commitment to the project?
- What is the level of coordination with other projects/activities targeting child education and welfare in the country?
- How will the short and long-term sustainability of the project be ensured?
- Will a tracking system be established to measure the long-term impact of the project?

*[Please note that in the future, we will ask that baseline surveys or rapid assessments be conducted prior to project development.]*

### **Target Group and Partners**

This section should describe who the direct and indirect beneficiaries of the project will be as well as a brief description of the responsibilities of each implementing agency. Issues to note are the following:

- How many children are targeted for removal from hazardous work? How many are targeted for prevention? What is the age group? Do these numbers make sense given the magnitude of the child labor problem in the country/sector? And the amount of funds requested for the project?
- What will be the specific role of each implementing agency or partner? Are the Ministries of Labor and Education adequately involved in the project implementation? How are these and other government agencies contributing to the project?
- For sector-specific projects, what is the role of the employers? What is the level of their contribution?

*[Note: For future projects, we suggest that the discussions of the partners be moved to institutional framework and project management section since it seems to fit better there.]*

### **Institutional Framework and Project Management**

This section provides information on the management structure of the project both at the local

and national level. The following issues are important:

- Who will oversee implementation at the project level?
- What is the role of the project coordinator and/or the chief technical advisor?
- If applicable, what is the role of the National Steering Committees (NSCs)?
- How will the management structure be mainstreamed into the community? Who will assume responsibility for continuing effort once project has been completed?

### **Objectives, Indicators, Outputs and Major Activities**

This section should provide information that will allow us to measure the effectiveness of the project in addressing hazardous child labor. Please see Attachment #1 for definitions of Objectives, Indicators, Outputs and Major Activities. The following issues are important:

- Are the objectives clearly stated? Are they consistent with the project approach and strategy? By when are the objectives expected to be achieved?
- Do the indicators of success follow the project objectives and strategy? Are they quantifiable? The document should include indicators for each project component (e.g., education, health, income generation, awareness raising, etc).
- Are project activities consistent with objectives and strategy previously discussed? Do they have a time frame by when they should be completed?
- Table/grid generally indicating when activities are expected to be conducted. (See Attachment #2 for an illustrative example).

### **Inputs**

This section deals with the financial or in-kinds inputs being provided by the Donor and other participating organizations. Important Issues:

- Does the USDOL contribution covers costs/activities that are essential to the effective implementation of the project?
- What is the contribution from the government? Ministry of Education? Ministry of Labor? This may be in-kind support.
- What is the contribution from the industry or employers? Usually, USDOL will not accept in-kind contribution unless they are substantial and directly benefitting the target population.
- What is the strategy for local assumption of these costs and ownership of the project in the long-run?

### **Planning, Monitoring, Evaluation and Reporting**

This section generally discusses the ILO and IPEC management of the project. It also discusses procedures for selection of implementing agencies, development of documents related to the project implementation, monitoring, evaluations, and reporting to be undertaken in the future. Provisions that should be included:

- **Report to USDOL on a quarterly basis:** *ILO/IPEC will report to the donor on a quarterly basis (or 4 times per year) on project implementation and progress as well as any problems encountered and proposed corrective action. These reports include two general status reports (March and September) and two detailed technical reports (June and December). In addition, ILO/IPEC shall submit detailed financial reports on a bi-annual basis.*
- **Contractor capability statement:** *For each contract issued under the project, a contractor capability statement must be provided to USDOL.*
- **Auditing provision:** *The USDOL reserves the right to request that the ILO's external auditor undertake a financial audit of this project. In the eventuality that such an audit is requested, additional terms of reference governing the audit would be agreed upon by the donor and the ILO, and attached as an Addendum to this Document, and project funds would be set aside to meet the costs of the audit.*
- **Summary outline and detailed workplan:** *A summary outline with a detailed budget shall be submitted to USDOL within two months of funding. A detailed workplan shall be provided to USDOL within one month of the start of the project (or once the project manager has been hired).*
- **Baseline surveys and revised list of indicators:** *The baseline survey shall be conducted within 3 months of the start of the project. The list of indicators shall be revised to ensure that they are detailed, quantifiable and result-oriented within 1 month after the completion of the survey. USDOL should be provided with a copy of these documents upon completion.*
- **USDOL participation in evaluations:** *A mid-term and final project evaluation will be conducted. The U.S. Department of Labor will be invited to participate in the final evaluation of the project, and will receive a copy of the evaluation report. In addition, ILO-IPEC will provide advance notice to USDOL regarding any major event in connection with this project.*
- **Long term sustainability:** *The project document should include an annex on the strategy for ensuring long-term sustainability of the effort.*
- **Monitoring and tracking component:** *A monitoring annex should be including describing the strategy for verifying that children removed from work are attending school and do not return to work. Also, a description of how the target population (children and families) will be tracked during the life of the project and how the long-term impact of the project will be assessed should be described in this annex.*
- **Budget provision:** *Given that the budget included in this document is indicative and preliminary, the USDOL reserves the right to comment on specific costs once the summary outline with a detailed budget has been submitted to USDOL.*

## **Budgets**

This section provides a general budget outline for the activities discussed in the project document. Issues to consider:

- Are the costs detailed in the budget directly associated with the activities described in the project document?
- Are the costs excessively high?
- Are "unallowable" costs such as "miscellaneous" or "sundries" included? These costs may be allowed if they are explained in detail and the cost are justified to ensure the efficient implementation of the project. These costs may be called "Other expenses" with a footnote explaining what they will be used for.
- Costs for expendable equipment (such as vehicles) should be justified in a footnote.
- The budget should be as specific as possible and it should be broken-down by year (and if possible work months).

## **Other Issues:**

- Grammar and Style: Should be consistent throughout the document.
- Consider what information is needed versus what it would nice to have in the document.
- These guidelines are not the totality of what should be included in the documents... please think carefully about what other issues need to be addressed in order to ensure that the project is designed properly.
- When reviewing regional or sub-regional projects including more than one country, make sure that the document is not redundant and that annexes contain information specific and relevant to each country.
- The duration of the project should depend on whether the services provided to the target group can be effectively implemented in that time frame. In addition, the length of time that may be necessary to mainstream the effort into the community to ensure local ownership and sustainability.

## Attachment #1

### Definitions of Key Performance Information

**Objective:** An objective or *goal* is a statement of the result the project is expected to accomplish. Objectives should be *outcome* oriented, whenever possible, and quantifiable. For example, "To reduce by 20% the number of children involved in hazardous agricultural work in El Salvador."

**Outcome:** An outcome is the fundamental purpose or result the project seeks to achieve, and answers the question: *Why is the funding being provided?*

An outcome measure provides the information to determine whether the goal has been met. Using the example above, the outcome measure would be the number of children who have been removed from hazardous agricultural work.

**Output:** An output is a measure of *progress* toward the goal by completing an *activity* important to achieving the goal, but not does not directly measure the project's results. For example, if finding jobs for adults is critical to removing children from hazardous labor, the increase in the number of adults employed in families with working children would be an output indicator. The enactment of legislation requiring children to attend school through a designated age could also be an output indicator.

**Indicator:** An indicator is the information or data source that will tell us whether the project is achieving the goal. Indicators are identified for both outcome and output measures. Continuing with the example above, the increase in adult employment based on the country's records for the targeted agricultural communities would be an output indicator. The increase in the number of children enrolled in schools, and the decrease in the number of working children based on survey results would be outcome indicators.

**Activity:** An activity is a strategy or intervention which will assist in achieving the intended project result. For example, meetings with the parents, agricultural employers, school officials and community leaders to increase awareness of the problem and enlist support for the project might be an important activity.

**Attachment #2**

**TIME TABLE**

Activity	1 <sup>st</sup> Year			2 <sup>nd</sup> Year		
Establish Project Office						
Recruit Project Coordinator & Admin. Assist.						
Baseline Survey						
Design monitoring system						
Recruitment and training monitors						
Implementation Sub-programme Education						
Implementation Sub-programme Alternative Income						
Implementation Sub-programme Health Services						
Implementation Sub-programme Awareness Raising						
Implementation Sub-programme Monitoring						
Mid-term review			X			
End-term review						X

[This is an illustrative time table for the Tomato Project in the Dominican Republic. The more detailed the table is the better it is for establishing a clear picture as to when activities will be conducted. Also, given that the initial funding advance will be made for up to 6 months, the project document should indicate which activities will be conducted in the first 6 months of the project. The justification for advanced funding/payment is based on projected activities.]

**APPENDIX A - AGENCY RESPONSE**



September 22, 2000

MEMORANDUM FOR: PATRICIA DALTON  
Acting Inspector General  
Office of the Inspector General

FROM: ANDREW J. SAMET  
Deputy Under Secretary  
Bureau of International Labor Affairs

SUBJECT: Evaluation of Program Implementation  
ILAB's Child Labor Projects--Fiscal Years 1995-2000  
Report No. 2E-01-070-0001

We have received the September 5, 2000 official draft report of the OIG's evaluation of ILAB-funded child labor projects from fiscal years 1995-2000. We appreciate the opportunity to comment on the report.

On September 1, 2000, ILAB provided the OIG Office of Analysis, Complaints, and Evaluations (OIG Evaluation Office) with additional information and extensive comments to an earlier draft report. However, we find that the current draft reflects only a few word changes. Our main concerns, which dealt with the accuracy of information in the draft, were not addressed in the final report. Nor was there further discussion with ILAB prior to submission of the official draft. In addition, in revising one section of the report, we believe the Evaluation Office selectively used the new information provided by ILAB, which resulted in an incomplete presentation of what occurred.

This memorandum provides comments to the OIG draft report. We request that the draft be revised to address our views, as set out below. In the absence of any mutually-agreeable revision to the draft, we formally ask that this memorandum, along with its attachments, be included in the OIG's final published report.

**General Comments:**

As we indicated in our earlier comments, the OIG report does not appear to make clear how ILAB funds its international child labor projects. ILAB does not, as the report appears to

consistently state, implement child labor projects directly. Rather, ILAB currently provides funding to the International Labor Organization's (ILO) International Program on the Elimination of Child Labor (IPEC). IPEC assesses the extent and nature of child labor in specific countries and implements projects aimed at removing children from hazardous work and providing them and their families with viable alternatives to child labor. This essential context is missing from the Executive Summary and the body of the report. Consequently, the roles of ILAB and IPEC are misrepresented throughout the report.

### **Executive Summary**

In our previous comments, we requested that the Executive Summary be revised to fully reflect the situation. As currently written, it does not make clear the relative roles of ILAB and IPEC noted above, nor does it provide information regarding the steps taken by ILAB's International Child Labor Program (ICLP) to increase staffing to manage child labor projects and enhance management and organizational controls.

We also requested that the OIG withdraw the recommendation and finding on project planning (Recommendation and Finding #1) and reconsider the finding and recommendation on project inspections (Finding #3), taking into consideration information provided to the OIG Evaluation Office on August 31, 2000. Please refer to the specific comments below.

### **Project Planning (Finding #1)**

OIG Recommendation: The OIG recommends that ICLP adopt a two-stage funding process: "ICLP should a) fund and conduct a needs and requirements assessment of the target population, and b) use the information from the needs and requirements assessment to determine appropriate funding for implementation of the child labor elimination project."

ILAB Response: During meetings with the OIG Evaluations Office on June 1<sup>st</sup> and June 15<sup>th</sup>, ICLP staff identified the need to conduct baseline research prior to finalizing and funding project documents and explained that actions were already being taken, in coordination with the ILO, to initiate such a procedure for projects to be funded in fiscal year 2001. In our September 1<sup>st</sup> memorandum, ILAB requested that this finding and recommendation be withdrawn for the following reasons:

- the OIG Evaluation Office neither identified this issue nor contributed a solution, and
- the recommendation was already being implemented.

As an attachment to our September 1, 2000 memorandum, we also provided the OIG Evaluation Office with information documenting the fact that ICLP had already started to implement this recommendation. During meetings with the ILO on August 9-11, DOL and the ILO reached formal agreement that starting with fiscal year 2001, there would be a two-stage funding process for projects requiring baseline information. Under this agreement, IPEC will submit a separate

proposal to DOL for project development, including baseline surveys. Accordingly, baseline data on target populations will first be collected and analyzed, then used as the basis for project development and budgeting.

We reiterate that the implementation of this recommendation was already in process before the initiation of the OIG's review and request that it be withdrawn.

OIG Finding: ICLP funds and implements projects without first identifying the specific needs and requirements of the target population.

ILAB Response: As explained above, ILAB has already addressed the concerns raised in this finding by reaching agreement with the ILO to collect baseline data prior to finalizing project design and budget, starting with projects funded in fiscal year 2001. However, it is important to note that for projects funded under earlier arrangements, there was sufficient information to justify funding child labor projects.

To illustrate the OIG finding, the examples used are ICLP-funded projects to remove children from hazardous work in the Brazilian footwear industry and the Central American coffee industry. For both of these projects, while the ILO did not have baseline data on the target population prior to project funding, the existence of child labor in these industries was well-known and documented. DOL had included information on child labor in these industries in its annual reports, *By the Sweat and Toil of Children*, in 1994 and 1995. Even without baseline data, the goals of the projects were clear: remove children from hazardous work and provide them with educational opportunities. Target populations were estimated based on available information, and resources and budgets were developed based on local experts' knowledge of the costs of providing certain services to the target populations.

For the Brazil project, the statement included in the project document and repeated in the OIG draft report indicating that "statistics on child labor in the Brazil shoe industry were not available" was taken out of context. While there had not yet been a specific baseline survey related to the proposed project, the project document cites several reports of extensive child labor in the footwear industry in the Sinos Valley, including information on children's conditions of work and school attendance. In the country annexes to the Central America coffee project document, there is data reflecting significant use of child labor in coffee production in each of the countries covered and information on the types of work children perform. For these projects, as with all ILAB-funded child labor projects in specific sectors, the collection of baseline data was the first activity conducted when implementation began.

## **Project Goals, Objectives and Indicators (Finding #2)**

OIG Recommendation: The OIG recommends that ICLP ensure that specific, well-defined outcomes oriented goals, objectives, and indicators are developed and included for each project proposal.

ILAB Response: We agree with the OIG's recommendation that more specific, well-defined goals, objectives, and indicators should be included in ILAB-funded child labor projects, and we are working closely with the ILO to continuously improve in this area. ILAB's ability to measure project impact will be further improved with the inclusion of additional measurable indicators and tracking/monitoring mechanisms to determine the status of the target population at any given point of project implementation. ILAB has also been working, with OASAM, to apply GPRA principles at the project level by adopting more well-defined outcome goals linked to measurable project indicators of success. In addition, ILAB has added experienced staff from the OIG to strengthen its capacity to ensure that ILAB-funded child labor projects contain well-defined and outcome-oriented goals, objectives and indicators.

OIG Finding: While ICLP projects have shown some success, it is difficult to determine the impact or level of success of the projects. Goals, objectives, and indicators were not specific nor were they adequately defined. It is difficult to comprehensively assess the benefits or outcomes obtained from the results that were generated.

ILAB Response: The OIG evaluation only covers the period through FY1999, and therefore does not reflect improvements that have already been made to better define goals, objectives, and indicators of child labor projects developed for funding in FY 2000. In addition, while some of the indicators for child labor projects funded prior to FY 2000 could be improved to be more clearly defined and measurable, the goals and objectives of the projects were clear - to remove children from hazardous work and provide them and their families with viable alternatives to child labor. As a result of these projects, tens of thousands of working children have been provided with an opportunity to attend school.

## **Project Inspection Allegations (Finding #3)**

OIG Recommendation: With regard to the project inspection allegations, the OIG recommends that ICLP: a) thoroughly investigate and follow up on all serious allegations; b) implement appropriate corrective actions; and c) adequately document steps taken.

ILAB Response: ILAB considers the credibility of the ILO's monitoring system to be essential to the success of the projects that we fund. ILAB agrees that each serious allegation requires follow up, and we have consistently made it a priority to treat all allegations seriously through

appropriate forms of follow-up and documentation. Since some of the communication regarding the subject allegations was by telephone, each and every step taken by ICLP staff to follow up on the subject allegations may not have been documented.

However, it should not be assumed or implied that there was no follow-up on the subject allegations. For example, as ICLP explained to the OIG Evaluation Office, we have followed up on the allegations regarding incidence of child labor in garment factories in Bangladesh and the stitching of soccer balls in Pakistan through ongoing discussions with ILO staff in Geneva, Dhaka, and Sialkot, review of project monitoring reports, as well as through project site visits. These site visits include meetings with local NGOs (including those who made the subject allegations), ILO monitors and project staff, and manufacturers. In addition, an ICLP staff member traveled to Bangladesh to participate in a final evaluation meeting for the garment project in June 2000. ICLP staff continues to thoroughly follow up on any new developments relating to ILAB-funded child labor projects, including any child labor violations, as well as steps taken by the ILO to improve its monitoring system.

OIG Finding: ICLP can improve on: (1) its response to serious allegations regarding its inspection and verification system, (2) its follow-up on the allegations, and (3) documenting its response and follow-up. There is very little information in the project files documenting the steps taken by ICLP in response to the allegations and any follow-up steps taken.

ILAB Response: The OIG draft report initially focused on documentation of ICLP's response to allegations made regarding the monitoring systems of two IPEC projects - the soccer ball industry project in Pakistan and the garment industry project in Bangladesh. On August 31<sup>st</sup>, ILAB provided the OIG Evaluation Office with additional information from project files documenting follow-up to allegations relating to the soccer ball project in Sialkot, Pakistan. This information shows that ICLP staff requested that the ILO seriously consider each of the allegations and prepare an appropriate response addressing the concerns raised.

The ILO subsequently conducted a mid-term review of the project, addressing the allegations, and prepared a follow-up letter with detailed comments responding to the specific allegations -- this information is available in the project file. ILO staff from Geneva traveled to Pakistan to conduct the review along with project staff in Sialkot. In addition, ICLP staff conducted two site visits to Sialkot since the publication of the subject allegations. These visits included meetings with local NGOs, soccer ball manufacturers, and ILO and government officials to review the status of the project, including the credibility of the monitoring system. ICLP staff also participated in monitoring visits with ILO monitors. In our opinion, this section of the report should have been substantially revised to reflect this new information.

In the OIG official draft report, however, the new information provided by ICLP is presented out of context and inaccurate conclusions are drawn. The OIG report alleges that ICLP did not

provide a point by point response to the allegations made regarding the ILAB-funded child labor project in the soccer ball industry in Pakistan and instead issued a mid-term report simply stating how the monitoring system is designed to operate. This is inaccurate for several reasons. First, ICLP requested that the ILO look into these allegations and treat each and every point with the utmost amount of seriousness. Second, concerns raised by the allegations were addressed in the ILO mid-term project review and in a follow-up letter that provided detailed responses to the specific allegations.

#### **Sustainability (Finding #4)**

OIG Recommendation: The OIG report recommends that ICLP obtain written agreements from project partners which clearly delineate each partner's role in capacity building and project sustainability.

ILAB Response: ILAB agrees with the importance of obtaining commitments by project partners to build capacity and project sustainability. This recommendation is based on two groundbreaking agreements that ILAB helped negotiate in Bangladesh and Pakistan. While these agreements worked well within the context of those projects to reiterate the commitments of the respective partners, this type of agreement may not be the appropriate mechanism to ensure sustainability of all project results in all cases. This is why in our memorandum of September 1, 2000, we suggested modifying the phrasing of the recommendation in the following way:

"We recommend that ICLP obtain written agreements, **as appropriate**, from project partners which clearly delineate each partner's role in capacity building and project sustainability."

ILAB works to ensure that every child labor project funded includes a strategic view on sustainability. However, it is important to maintain at least a minimum level of flexibility in order to apply the most appropriate sustainability strategy on a case by case basis.

OIG Finding: ICLP does a good job in delineating the roles of its partners in attempting to achieve project sustainability. The OIG believes that ICLP can go a step further by obtaining written agreements from its project partners to increase the probability that the partners will uphold their responsibility.

ILAB Response: Long-term sustainability, capacity-building, and community involvement are essential components of ILAB-funded child labor projects. Every project document funded by ILAB clearly delineates the roles of each implementing and collaborating agency. Furthermore, each project implementing agency (local organizations that implement parts of the project) is already required to sign an agreement with the ILO that stipulates the conditions under which the work will be carried out.

## Other Matters (Finding #5)

OIG Recommendation: The OIG report recommends that ICLP expand and strengthen the draft General Guidelines into an operations manual for staff use.

ILAB Response: ICLP is in the process of finalizing the General Guidelines for Review of IPEC Project Documents which will be incorporated into an operations manual for ICLP staff. ICLP has already reached agreement with the ILO on a number of matters, including project funding, oversight, monitoring, reporting, evaluation, and communications procedures, which will also be incorporated in the ICLP operations manual. ICLP has requested but not received a copy of the OIG's Office of Analysis, Complaints, and Evaluations operations manual, or other appropriate manuals, to be used as a model.

OIG Finding: The OIG report commends ICLP for drafting guidelines for project document review and provides a few suggestions specific to these guidelines, including: stating the overall purpose of the guidelines; specifying the roles of ICLP and ILO for using the guidelines; addressing matters such as project proposal review and approval and site visits and ICLP monitoring; and being consistent in the use of terminology.

ILAB Response: The General Guidelines for Review of IPEC Project Documents provided to the OIG Evaluation Office was a draft document that is still being finalized. The intent of this document is to provide guidance to ICLP staff on how to review draft IPEC project documents that are being considered for funding. This document is not intended to provide guidance for oversight of projects that have already been funded as the OIG report implies.

If you have any questions or would like to discuss these comments prior to finalizing your report, please do not hesitate to contact me. Thank you for your consideration.

### Attachments

1. ILAB's Response to OIG draft report (dated September 1, 2000) [official copy dated 9/5/00]
2. Updated List of ILAB funded child labor projects (dated September 22, 2000)

cc: Jose M. Ralls  
Patricia Lattimore



September 5, 2000

MEMORANDUM FOR: JOSE M. RALLS  
Acting Assistant Inspector General  
Office of Analysis, Complaints and Evaluations

FROM: ANDREW J. SAMER  
Deputy Under Secretary  
Bureau of International Labor Affairs

SUBJECT: Evaluation of Program Implementation  
ILAB's Child Labor Projects--Fiscal Years 1995-2000  
Report No. 2E-01-070-0001

Thank you for the opportunity to review and comment on the subject draft OIG Report. We are concerned that the report does not reflect critical information provided to your staff and therefore lacks balance in several sections. This memorandum provides general comments. We have also attached a copy of a report annotated with specific revisions which we recommend.

#### Executive Summary

The Executive Summary should be as full a summary as possible, given that some readers will read only the Executive Summary. We also ask that you reconsider Findings #2 and #3, taking into consideration the new information provided to your staff on August 31, 2000 and the attached "Project Development Guidelines and Timetable," which reflects a recent agreement reached with the ILO. Please refer to our specific comments below and in the draft.

#### Project Planning

The OIG is proposing that ICLP adopt a two-stage funding process. ICLP staff had identified this as an issue, and actions were in process to initiate this procedure, prior to the evaluation. In discussions with your staff, ICLP staff explained the new procedures, which had already been discussed with the ILO, to fund the collection of baseline information prior to finalizing and funding project documents for fiscal year 2001 funding. We therefore request that this finding be withdrawn since your office neither identified this issue nor contributed a solution.

Should you retain this finding, several important facts should be included. During meetings with the ILO on August 9-11, DOL and the ILO reached formal agreement that starting with fiscal

year 2001, there would be a two-stage funding process for projects requiring baseline information. Under this agreement (see attached "Project Development Guidelines and Timetable"), IPEC will submit a separate proposal to DOL for project development, including baseline surveys. Baseline data on target populations will first be collected and analyzed, then project budgets and documents will be developed based on this data.

In the two examples provided, the Brazil shoe industry and Central America coffee projects, while the ILO and DOL did not have baseline data prior to project funding, the existence of child labor in these industries was well-known. DOL had included information on child labor in these industries in its annual report, *By the Sweat and Toil of Children*. Even without baseline results, the goals of the projects were clear: remove children from hazardous work and provide them with educational opportunities. Target populations were estimated based on available information and resources, and budgets developed based on local experts' knowledge of the costs of providing certain services to the target number. For the Brazil document, the citation that "statistics on child labor in the Brazil shoe industry were not available" was taken out of context. While there had not yet been a survey focusing on child labor in the footwear industry in the Sinos Valley, the project document does cite several reports of extensive child labor in the shoe industry in the Sinos Valley, including information on children's conditions of work and school attendance.

#### **Project Goals, Objectives and Indicators**

ILAB's ability to measure project impact will be improved with the inclusion of additional measurable indicators, and we are working with the ILO to improve in this area. Your evaluation only covers the period through FY1999, and therefore does not take into account the projects developed for funding in FY2000. These projects reflect a considerable improvement in defining goals, objectives, and indicators. ILAB has also been working, with OASAM's support, to apply GPRA principles at the project level. These efforts are also being incorporated into projects for FY2000, which contain more well-defined outcome goals linked to measurable project indicators of success.

#### **Project Inspection Allegations**

We have provided your staff with additional information documenting follow-up to allegations relating to the Sialkot soccer ball project in Pakistan. This information shows that ILAB staff requested that the ILO seriously consider each of the allegations and follow up through a letter directly addressing the allegations as well as a mid-term project review. ILO staff from Geneva traveled to Pakistan to conduct the review along with project staff in Sialkot. In addition, ICLP staff conducted two site visits to Sialkot since the publication of the subject allegations. These visits included meetings with local NGOs, soccer ball manufacturers, and ILO and government officials to review the status of the project, including the credibility of the monitoring system. ICLP staff also participated in monitoring visits with ILO monitors. This section of the report should be substantially revised to present this new information.

While the particulars of ICLP staff's initial response to the Bangladesh allegations may not be available in a documented form, it should not be assumed or implied that we did not follow up. As we explained to your staff, ILAB has consistently followed up on allegations regarding incidence of child labor in garment factories in Bangladesh through ongoing discussions with ILO staff in Geneva and in Dhaka, review of project monitoring reports, as well as through project site visits. These site visits include meetings with local NGOs (including those who made the subject allegations), ILO monitors and project staff, and manufacturers. In addition, an ICLP staff member traveled to Bangladesh to participate in a final evaluation meeting in June 2000.

In your report, you indicate that allegations were made by AAFLI and the Bangladesh Independent Garment Workers Union regarding violations of the MOU not uncovered by the inspectors. During recent visits this year to Bangladesh, ICLP staff participated in discussions and site visits with ILO monitors and project staff. Monitors in Bangladesh informed ICLP staff that they are aware that such allegations have been made and are taking precautions to ensure that children are not being hidden in advance of their inspections. Monitoring visits continue to be unannounced, and monitors check all areas, including bathrooms, where children could possibly be hidden. ICLP staff continues to follow new developments and allegations relating to child labor violations, as well as steps taken by the ILO to improve its monitoring system.

If you have any questions, please do not hesitate to contact me at 693-4770 or Maureen Jaffe of the International Child Labor Program at 208-4843.

USDOL-Funded IPEC Projects

FY 1995- 2000

(Updated: September 22, 2000)

COUNTRY	PROJECT	AMOUNT	DATE FUNDED
<b>ASIA</b>			
Bangladesh	Elimination of child labor in <i>BGMEA garment factories</i> Phase II - Continuation of <i>Monitoring and Verification</i> Project in Bangladesh	\$867,273 \$840,779	May 1996 April 1998
Bangladesh	Prevention and Elimination of the Worst Forms of Child Labor in Selected Formal and Informal Sectors	\$6,000,600	September 2000
Philippines	<i>A Statistical Program for Advocacy on the Elimination of Child Labor and the Protection of Children in the Philippines</i>	\$268,465	October 1995
Thailand	Phase I - Program to Prevent Child Labor and <i>Forced Child Prostitution</i> Phase II - Continuation of the Program to Prevent Child Labor and <i>Forced Child Prostitution</i>	\$484,923 \$261,070	October 1995 August 1997
Nepal	Elimination of <i>Trafficking and Commercial Sexual</i> Exploitation of girls.	\$190,323	August 1997
Pakistan	Project to Phase Children Out of the <i>soccer ball industry</i> , Provide Educational Opportunities, and Conduct Internal and External Monitoring.	\$755,744	September 1997

COUNTRY	PROJECT	AMOUNT	DATE FUNDED
	Phase II: Elimination of Child Labor in the <i>Soccer Ball Industry</i> in Sialkot.	\$1,109,831	August 2000
Pakistan	Project to Phase Children Out of the <i>Carpet Sector</i> , Place Them in Schools, and Establish Compliance Monitoring System. (Phase I)	\$2,055,146	April 1999
South East Asia: 1. Indonesia 2. Philippines 3. Thailand	Elimination of child labor in the <i>footwear industry</i> .	\$1,961,657	September 1999
South East Asia: 4. Indonesia 5. Philippines	Elimination of child labor in the <i>fishing industry</i> .	\$934,747	September 1999
Mongolia	<i>National Program</i> to Eliminate Child Labor in Mongolia.	\$569,633	September 1999
East and South East Asia	<i>ILO/Japan/U.S. Asian Regional Tripartite Workshop</i> on Core Labor Standards, including child labor.	\$111,870	November 1999
South Asia: 6. Bangladesh 7. Nepal 8. Sri Lanka	Elimination of <i>Trafficking</i> of children in South Asia.	\$1,789,426	February 2000
<b>AFRICA</b>			
Africa: • Ethiopia • Ghana • Kenya • Malawi • South Africa • Tanzania • Uganda • Zimbabwe	<i>Technical workshop</i> on Child Labor in Commercial Agriculture in Africa	\$170,381	October 1995

COUNTRY	PROJECT	AMOUNT	DATE FUNDED
South Africa	<i>Statistical Program for Advocacy on the Elimination of Child Labor and the Protection of Working Children in South Africa</i>	\$687,697	July 1998 (\$622,274) and August 1999 (\$65,423)
Uganda	<i>National Program to Eliminate Child Labor in Uganda</i>	\$1,196,262	May 1999
West & Central Africa: • Benin • Burkina Faso • Ghana • Mali • Togo • Cameroon • Gabon • Ivory Coast • Nigeria	Combating the <i>trafficking</i> of Children for Labor Exploitation in West and Central Africa (Phase I)	\$225,525	August 1999
Nigeria	<i>National Program to Eliminate Child Labor in Nigeria</i>	\$718,928	December 1999
Nigeria	<i>Statistical Program for Advocacy on the Elimination of Child Labor and the Protection of Working Children in Nigeria.</i>	\$282,613	August 1999
Uganda	<i>Statistical Program for Advocacy on the Elimination of Child Labor and the Protection of Working Children in Uganda.</i>	\$295,608	September 1999
Zambia	<i>National Program to Eliminate Child Labor in Zambia</i>	\$630,512	September 1999
	<i>Statistical Program for Advocacy on the Elimination of Child Labor and the Protection of Working Children in Zambia.</i>	\$289,775	September 1999
Ghana	<i>Statistical Program for Advocacy on the Elimination of Child Labor and the Protection of Working Children in Ghana.</i>	\$397,617	September 1999
Ghana	<i>National Program to eliminate Child Labor in Ghana</i>	\$650,703	October 1999

COUNTRY	PROJECT	AMOUNT	DATE FUNDED
South Africa	<i>National Program to Eliminate Child Labor in South Africa (Phase I: Policy Development)</i>	\$121,929	July 2000
<b>Latin America and the Caribbean</b>			
Brazil	Combating Child Labor in the <i>shoe industry</i> of Vale dos Sinos, Brazil	\$308,958	October 1995
Central America:	Combating child labor in Central America and the Caribbean	\$1,000,000 Total	April 1998
• Regional	Creating a <i>database</i> on child labor information	\$50,000	
• Costa Rica	Combating <i>Child Prostitution</i>	\$160,700	
• Dominican Republic	Combating Child Labor in <i>Agriculture</i>	\$160,000	
• El Salvador	Combating child labor in <i>shellfish harvesting</i>	\$100,000	
• Guatemala	Combating child labor in <i>stone quarries</i>	\$100,000	
• Nicaragua	Combating Child Labor and <i>Sexual Exploitation</i>	\$148,940	

COUNTRY	PROJECT	AMOUNT	DATE FUNDED
Haiti	National Program to eliminate child labor in Haiti and an action program to combat <i>child domestics</i> .	\$1,223,535	April 1999
Guatemala	Combating child labor in the <i>fireworks industry</i>	\$1,235,853	May 1999
Brazil	Statistical Program for the Advocacy of the Elimination of Child Labor in Brazil	\$1,633,599	September 1999
Central America	Statistical Program for Advocacy on the Elimination of Child Labor and the Protection of Working Children in Central America.	\$2,210,173	October 1999
<ul style="list-style-type: none"> <li>• Belize</li> <li>• Costa Rica</li> <li>• Dominican Republic</li> <li>• El Salvador</li> <li>• Guatemala</li> <li>• Honduras</li> <li>• Nicaragua</li> <li>• Panama</li> </ul>			
Central America:	Combating Child Labor in the <i>coffee industry</i> of Central America.	Total: \$6,112,187 Regional: \$1,169,503	November 1999
<ul style="list-style-type: none"> <li>• Costa Rica</li> <li>• Dominican Republic</li> <li>• El Salvador</li> <li>• Guatemala</li> <li>• Honduras</li> <li>• Nicaragua</li> </ul>		C.R.: \$880,468 D.R.: \$636,586 E.S.: \$688,449 Guat.: \$1,193,848 Hond.: \$441,769 Nic.: \$1,101,564	
South America:	Combating Child Labor in the <i>small gold mines</i> in South America.	\$2,859,123	March 2000
<ul style="list-style-type: none"> <li>• Bolivia</li> <li>• Ecuador</li> <li>• Peru</li> </ul>			
El Salvador	Combating child labor in the <i>fireworks industry</i>	\$1,008,327	March 2000
Nicaragua	Combating Child Labor in the production of <i>basic grains</i> .	\$681,021	March 2000
Nicaragua	Elimination of Child Labor at La Churesca Garbage Dumps in Manguta	\$1,112,510	September 2000

COUNTRY	PROJECT	AMOUNT	DATE FUNDED
Domitian Republic	Prevention and Elimination of Child Labor in <i>tomato</i> production.	\$865,412	July 2000
<b>Europe</b>			
Romania	<i>National Program</i> to eliminate child labor in Romania	\$586,168	September 1999
	<i>A Statistical Program</i> for Advocacy on the Elimination of Child Labor and the Protection of Children in Romania.	\$288,647	September 1999
<b>Global</b>			
Worldwide Awareness against child labor	Support Efforts of the <i>Global March Against Child Labor</i> at the Country Level and at its Culmination in Geneva.	\$174,178	February 1998
	IPEC <i>Global Campaign</i> to Raise Awareness and Understanding about the Worst Forms of Child Labor	\$1,243,000	March 2000
	Publication and Presentation Materials for <i>The Global Campaign Against Child Labor Conference:</i> Washington, D.C.	\$236,825	May 2000
SIMPPOC Rapid Assessments Surveys	Rapid Assessment Surveys on the Worst Forms of Child Labor	\$1,548,383	July 2000
<b>TOTAL</b>			
<i>Africa:</i> \$5,667,550	(12 projects)	\$41,083,826	
<i>Asia:</i> \$12,300,887	(14 projects)		
<i>Latin America &amp; Caribbean:</i> \$19,138,188	(18 projects)		
<i>Europe &amp; Middle East:</i> \$874,815	(2 projects)		
<i>Global:</i> \$3,202,386	(4 projects)		

